

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2015-205-E**

IN RE: Application of South Carolina Electric &     )  
Gas Company for Approval of Rider to     )  
Retail Rates - Net Metering for Renewable     )  
Energy Facilities     )

**JOINT PETITION  
TO  
INTERVENE**

**INTRODUCTION**

A Commission Docket was opened in this matter on June 2, 2015, by South Carolina Electric & Gas Company, (hereinafter, "SCE&G") and assigned the above-referenced Docket number. Joint Petitioners herein, are (i) Solbridge Energy LLC and (ii) Sustainable Energy Solutions, LLC. This Joint Petition to Intervene filed pursuant to R. 103-825, of this Commission's Rules and Regulations and other applicable Rules and Regulations of this Commission, seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation. This Joint Petition to Intervene follows:

**JOINT PETITIONERS**

Solbridge Energy LLC.

1. Solbridge Energy LLC (hereinafter, "Solbridge Energy"), is a Delaware Corporation, domesticated to conduct business in the State of South Carolina, with its principal place of business in Daniel Island, South Carolina.

2. Solbridge Energy is a Solar Development Company. Their business model is to (i) identify financially viable opportunities to build solar power plants (ii) package each solar power plant as a distinct project and investment opportunity, and (iii) manage the installation and ongoing operations of each project. Solbridge Energy focuses on projects ranging in size between one to twenty megawatts, located primarily along the Eastern Seaboard. Solbridge Energy, along with its development partner, controls a portfolio of approximately 100 MW.

Sustainable Energy Solutions, LLC.

3. Sustainable Energy Solutions, LLC (hereinafter, “Sustainable Energy”), is a Limited Liability Corporation, organized under the Laws of the State of South Carolina with its principal place of business in Charleston, South Carolina.

4. Sustainable Energy is a renewable energy solutions provider, with a focus on solar thermal and photovoltaic energy systems. Sustainable Energy has installed over 600 Solar Energy Systems in six different States. Their services include planning, consulting, design, system installation and maintenance and project development.

5. As a developer, Sustainable Energy controls a pipeline of 150 MW of utility scale projects focused mainly in the Southeastern States, including Maryland, North Carolina, South Carolina and Arkansas. Sustainable Energy’s projects range in size from 1 to 50 MW.

Request for Joint Intervenors Status.

6. Although Solbridge Energy and Sustainable Energy are separate legal entities, they share: common business interest, financing sources and are joint development partners.

7. This Commission has previously allowed joint intervention by Solbridge Energy and Sustainable Energy. Because of their closely interrelated interests in this Docket, Solbridge Energy and Sustainable Energy are filing this, “Joint Petition to Intervene”.

8. Joint Petitioners were granted leave by this Commission, to Intervene in the Genesis Docket related to the Act, Docket 2014-246-E, and Joint Intervenors participated in the Hearing held in that Docket.

9. Joint Petitioners conduct businesses in SCE&G’s territory, including sales to SCE&G Consumers. Joint Petitioners participated in the discussions leading up to the Act.

SCE&G’s Application.

10. Commission Order No. 2015-194, dated March 20, 2015, issued in Docket 2014-246-E, *inter alia*, required that SCE&G file a separate Application with this Commission for approval of a new Net Metering Tariff, consistent with the Settlement Agreement in that Docket, and S.C. Code Ann. Section 58-40-10 (Supp. 2014).

11. A Settlement Agreement was reached by the parties to Docket 2014-246-E and filed with this Commission. The Settlement Agreement, *inter alia*, established a Net Energy Metering Methodology to be used by SCE&G to calculate the costs and benefits of Net Metering and for cost recovery purposes. SCE&G has calculated a value of Net Metering Methodology for use in its 2015 Application, and SCE&G is required to update that value on an annual basis.

12. The Settlement Agreement, *inter alia*, required SCE&G to file a new Net Metering Application in a separate Docket before this Commission and the Settlement Agreement stated that all interested parties would have the right to fully participate in that Docket.

13. Joint Petitioners' position is that they have a direct and substantial interest in the decisions to be made by this Commission in this Docket and their interests cannot be adequately addressed by any other party. Joint Petitioners' Intervention will aid this Commission, by assisting in the development of a full and fair record to address the issues raised in this Docket. Joint Petitioners have a direct and material interest in the issues to be addressed and resolved by this Commission in this Docket and Joint Petitioners interests are not adequately represented by the current parties in this Docket.

14. This Joint Petition to Intervene is timely filed with this Commission.

15. Joint Petitioners' Intervention is consistent with this Commission's long standing policy, "...in encouraging maximum public participation in issues before this Commission, and [Intervention] should be allowed so that a full and complete record... can be developed." (Order No.: 2005-725, in Docket No.: 2005-270-G, dated December 16, 2005).

16. Joint Petitioners should be allowed to intervene in this Docket, with full rights of cross examination, discovery and participation in any Hearing to be scheduled in this Docket.

### **JOINT PETITION TO INTERVENE**

17. The granting of Solbridge Energy LLC's Petition to Intervene and Sustainable Energy Solutions, LLC's Petition to Intervene, filed jointly is (i) consistent with the Settlement Agreement (ii) in the public interest and (iii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed.

18. Solbridge Energy LLC and Sustainable Energy Solutions, LLC are represented by counsel in this proceeding:

Richard L. Whitt  
AUSTIN & ROGERS, P.A.  
508 Hampton Street, Suite 300  
Columbia, South Carolina 29201  
Telephone: (803) 251-7442  
Facsimile: (803) 252-3679  
RLWhitt@AustinRogersPA.com

**WHEREFORE**, Joint Petitioners pray for the following relief:

(a) That this Joint Petition to Intervene be accepted and that Joint Petitioners be made parties of record;

(b) That Joint Petitioners be allowed to participate fully in this proceeding and take such positions as they deem advisable; and

(c) For such other and further relief as is just and proper.

Respectfully Submitted,

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Richard L. Whitt

**AUSTIN & ROGERS, P.A.**

508 Hampton Street, Suite 300

Columbia South Carolina, 29201

803-251-7442

Counsel for Joint Petitioners, Solbridge Energy LLC  
and Sustainable Energy Solutions, LLC

July 16, 2015

Columbia, South Carolina